

Addendum to First Steps Policy & Procedure Manual
Relates to: VI Individualized Family Service Plan –
911 KAR 2:200E Section 3
July 1, 2004

Implementation of service limitations in relation to the IFSP process

Effective July 1, 2004, the IFSP team must plan services according to the number of service units identified in 911 KAR 2:200 Section 3. Unless approval for exemption to the limits has been obtained according to procedures for Prior Authorization in Section 4 of this regulation, IFSP teams must comply with regulatory service limits. IFSP teams must design a plan within the service limits by placing the child's needs and the family's priorities as their primary consideration and by utilizing teamwork and flexibility. To act in the best interest of the child and family, providers must truly perform as a team, use a professional approach to decision-making, use a proactive approach to service unit allotment and adapt the planning process to incorporate the required limitations.

For convenience, the following points highlight the service limits and other related considerations for planning. (It is important to note that providers are responsible for implementing all regulations and not only those pertinent herein):

In regard to payment for **collateral services**, each team member is limited to 4 units for IFSP meeting attendance.

- In other words, no payment will be made for more than one (1) hour for each individual provider attending the IFSP meeting.

Only a **primary level evaluator** who has provided feedback and interpretation of the evaluation to the family prior to the IFSP meeting (per 911 KAR 2:120 Section 1 (4) (e) 2b) may participate in the initial IFSP. The PLE will be paid at the collateral services rate for his or her discipline.

- A PLE may not provide therapeutic intervention to a child whom he or she evaluated and determined to be eligible.

ISC and **PSC** service limits are separate from each other and from the other services.

- Initial Service Coordination is to be limited to no more than twenty-five (25) hours or 100 units per child period of eligibility.
- Primary Service Coordination is to be limited to no more than ten (10) hours or forty (40) units per child per the 6-month period of the IFSP.

Service assessment limits are separate from the other services. Service assessment is limited to no more than 2 ½ hours per child per discipline per assessment.

- Assessments must be limited to more than three (3) per discipline per child during the child's participation in First Steps. Since assessments are for the purpose of program planning in First Steps, the IFSP team must use good judgment and not approve assessments if the child is almost ready to transition from First Steps.

The hours allotted for service coordination and service assessment, are separate from the hours allowed for **therapeutic intervention** for the child and family.

- If the child needs **only one therapeutic service**, the team must plan for up to 96 units or 24 total hours of intervention for a six-month plan.
- If the child needs **more than one therapeutic service**, the team must plan for up to 144 units or 36 total hours of intervention.
- For therapeutic intervention, service must be limited to one (1) hour per day per discipline per child.

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- The team cannot plan for the child to receive individual therapeutic intervention while also receiving group intervention for the same service. Group service is an exception to the one-hour per day limit to therapeutic intervention since the limit for group intervention is two and one-half hours (10 units) per day.
- Payment for siblings seen at the same time shall be calculated by dividing the total time by the number of siblings to determine the amount of time to bill per child.
- For cotreatment, payment must be limited to three (3) disciplines providing services concurrently.

EXAMPLE OF DISTRIBUTION OF UNITS IN SERVICE PLANNING FOR SINGLE THERAPEUTIC DISCIPLINE

Total Service Limit per 6-month plan: (24/26 wks) 96 units/1440 minutes/24 hrs

Example: DI service with frequency & intensity options

DI: 60 minutes = 1 hour (4 units) per week for 24 weeks;

Or 30 minutes = ½ hour (2 units) two times per week for 24 weeks;

Or 60 minutes = 1 hour (4 units) two times per week every other week for 24 weeks;

Or 60 minutes = 1 hour (4 units) two times (2 X) per week for 12 weeks;

Or 60 minutes = 1 hour (4 units) five times (5 X) per week for 4 weeks followed by

60 minutes = 1 hour (4 units) one time (1 X) per month for 4 months.

EXAMPLES OF DISTRIBUTION OF UNITS IN SERVICE PLANNING FOR 2 THERAPEUTIC DISCIPLINES OR MORE

Total Service Limit per 6-month plan: (24/26 weeks) 144 Units/2,160 minutes/36 hrs

Based on the family's priorities and concerns and the child's assessed needs, plan distribution of service units per discipline by determining the appropriate duration/intensity per service session and the frequency of visits. To assure that the maximum allowable service units are not exceeded utilize the totals referenced above (Total Service Limit per 6-month plan (26 weeks): 144 Units/2,160 minutes/36 hours). For example, calculate the total minutes based on service units per session by multiplying the number of units by 15, and then divide the total number of minutes by 26 weeks; To calculate the number of hours, divide the total number of units by 4, etc. For further clarification refer to the following six (6) possible scenarios based on a six (6) month IFSP plan period:

Example #1 – PT and OT – Split Evenly

Based on 24 weeks where 26 weeks would exceed maximum allowable units:

PT: 72 units = 1080 minutes = 45 minutes (3 units) per week for 24 weeks

OT: 72 units = 1080 minutes = 45 minutes (3 units) per week for 24 weeks

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Example #2 – PT, OT and ST

Based on 24 weeks where 26 weeks would exceed maximum allowable units:

- PT: 48 units = 720 minutes = 60 minutes (4 units) per week for 12 weeks
Or 30 minutes (2 units) per week for 24 weeks
- OT: 48 units = 720 minutes = 30 minutes (2 units) per week for 24 weeks
Or 45 minutes (3 units) per week for 16 weeks
Or 60 minutes (4 units) per week for 12 weeks or 2X month for 24 weeks
- ST: 48 units = 720 minutes = 30 minutes (2 units) per week for 24 weeks
Or 45 minutes (3 units) per week for 16 weeks
Or 60 minutes (4 units) per week for 12 weeks or 2X month for 24 weeks

Example #3 – PT, OT and ST (family most concerned w/child walking)

Based on 26 week plan [144 units]:

- PT: (50% total units) 72 units = 1080 minutes = 45 minutes (3 units) per wk for 24 weeks
- OT: (25% total units) 36 units = 540 minutes = 45 minutes (3 units) per wk for 12 weeks or 2X month for 24 weeks
- ST: (25% total units) 36 units = 540 minutes = 45 minutes (3 units) per week for 12 weeks or 2X month for 24 weeks

Example #4 – PT, OT, ST, DI – Split Evenly

Based on 26 week plan [144 units]:

- PT: (25% total units) 36 units = 540 minutes = 45 minutes (3 units) per week for 12 wks 2X per month
- ST: (25% total units) 36 units = 540 minutes = 45 minutes (3 units) per week for 12 wks 2X per month
- OT: (25% total units) 36 units = 540 minutes = 45 minutes (3 units) per week for 12 wks 2X per month
- DI: (25% total units) 36 units = 540 minutes = 45 minutes (3 units) per week for 12 wks 2X per month

Example # 5 – PT, ST, OT, DI (family most concerned w/ child's PT & ST needs)

- PT: (33 1/3 % of total units) 12 hrs = 48 units = 720 minutes = 30 min (2 units) per week for 24 weeks
Or = 60 min (4 units) per wk for 12 wks 2X per month
- ST: (33 1/3 % of total units) 12 hrs = 48 units = 720 minutes = 30 min (2 units) per week for 24 weeks
Or = 60 min (4 units) per wk for 12 wks 2X per month
- OT: (16.6 % of total units) 6 hrs = 24 units = 360 minutes = 60 minutes (4 units) per mo for 6 months
- DI: (16.6 % of total units) 6 hrs = 24 units = 360 minutes = 60 minutes (4 units) per mo for 6 months

Example # 6 – PT & ST (family most concerned w/ child's PT needs)

- PT: 24 hours = 96 units = 1440 minutes = 60 minutes (4 units) per week for 24 weeks
Or 30 minutes (2 units) per week for 24 weeks
- ST: 12 hours = 48 units = 720 minutes = 60 minutes (4 units) per week for 24 weeks

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Example # 7- Amendment Scenario (One discipline team becomes multidisciplinary at 3 months into the IFSP by adding one more service) (cross-reference with above single discipline example which shows options for DI)

To Add SLP when 12 hours of the total have been used and 24 hours are available for the remainder of the plan:
The team may decide to breakdown the remaining time as follows:

Dividing Equally: 12 hours for DI: 1 hour per week for 12 weeks
12 hours for SLP: 1 hour per week for 12 weeks

Or:

If SLP is required for more intense service: 6 hours for DI: 1 hour every other week for 12 weeks
18 hours for SLP: 1 ½ hours per week for 12 weeks

Example # 8 – Amendment Scenario (One discipline team becomes multidisciplinary at 4 months into the plan by adding SLP and PT)(cross reference with above single discipline example which shows options for DI)

DI has used 16 hours of the 24 hour maximum leaving a balance of 8 hours for the 8 remaining weeks of the IFSP.

Dividing Remaining hours evenly: 6 hours for SLP
6 hours for PT

Example # 9 - Amendment Scenario (A multi-disciplinary team decreases to a single discipline team)

The IFSP allotted service: SLP - 30 minutes (1 X) per week for 24 weeks
PT - 60 minutes (1 X) per week every other week for 24 weeks
DI – 60 minutes (1 X) per week every other week for 24 weeks

Three months into the IFSP period the child becomes age appropriate with DI and SLP therefore PT remains as a single discipline. To this point, the following units have been utilized:

SLP has used 6 hours (24 units)
PT has used 6 hours (24 units)
DI has used 6 hours (24 units)
Total units used: 72

The plan then drops to 96 total available units. The difference between 96 and 72 is 24 resulting in 24 remaining units available to PT for the three remaining months (12 weeks) of the IFSP. The service allocation could be written as follows:

PT – 60 minutes (4 units) (1 X per week) every other week for 12 weeks

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Example # 10 - Amendment Scenario (A multidiscipline decreases to a single discipline team) (cross reference Example # 1 where PT and OT have evenly split the 144 available units)

At five months (or 20 weeks) into the plan, the PT outcome has been achieved leaving OT to complete the remaining units. The available total drops to 96 units.

OT continues with 45 minutes (3 units) 1 X per week for the remainder of the IFSP period.

Example #11 – Group is part of the multidisciplinary team with 144 units available

DI & SLP Group 2X per week for 2½ hours (5 hours/20 units total) for seven (7) weeks
(total for 7 weeks = 140 units)

OR:

DI & SLP Group = 60 minutes (1 X) per week for 24 weeks

(96 units = 1 hour (4 units) per week for 24 weeks)

PT (Home and Community) 60 minutes (4 units) every other week for 12 weeks

(48 units = 1 hour (4 units) per week for 12 weeks)

(96 + 48 = 144 Units)